

Attorneys for Defendant

SAMANTHA KEEN,
Plaintiff
v.
ANDREW SAUL,
Commissioner of Social Security,
Defendant.

) Case No: 2:19-cv-00561-RFB-EJY
)
)
)
) **STIPULATION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT’S CROSS**
) **MOTION TO AFFIRM**
)
) **(First Request)**
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)
)

Defendant respectfully requests this extension of time because of a very heavy workload, including multiple district court merits briefs, as well as a Ninth Circuit responsive briefs, due the next month. In addition, the undersigned is taking leave time for a family vacation at the end of August.

1 On August 22, 2019, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

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4 Respectfully submitted,

5 Date: August 22, 2019

RICHARD HARRIS LAW FIRM

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7 By: /s/ Joshua R. Harris*
JOSHUA R. HARRIS
8 *authorized by email August 22, 2019

9 Attorney for Plaintiff

10 Date: August 22, 2019

NICHOLAS A. TRUTANICH
11 United States Attorney

12 By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
13 Assistant Regional Counsel

14 Attorneys for Defendant

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16 Of Counsel
Jeffrey Chen
17 Assistant Regional Counsel
Social Security Administration

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20 IT IS SO ORDERED.

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22 DATE: August 23, 2019

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HONORABLE ELAYNA J. YOUCHAH
24 UNITED STATES MAGISTRATE JUDGE
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